

REMARKS

The claims have not been amended. Claims 1 and 48 were previously canceled, and claims 2, 5-7, 9-12, and 14-46 were previously withdrawn. Accordingly, claims 3, 4, 8, 13, and 47 are currently pending in the application, of which claims 4 and 47 are independent claims. Claims 3, 4, 8, and 13 are allowed.

Applicants respectfully request reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

Rejections Under 35 U.S.C. § 103

Claim 47 stands rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent No. 7,037,779 issued to Nakajima ("Nakajima") in view of U. S. Patent No. 5,614,733 issued to Zhang, *et al.* ("Zhang"). Claim 47 also stands rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Nakajima in view of U. S. Patent No. 5,705,829 issued to Miyanaga, *et al.* ("Miyanaga"). Applicants respectfully traverse these rejections for at least the following reasons.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the reference or references, when combined, must disclose or suggest all of the claim limitations. The motivation to modify the prior art and the reasonable expectation of success must both be found in the prior art and not based upon a patent applicant's disclosure. See *in re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

The examiner has failed to establish a *prima facie* case of obviousness. Assuming *arguendo* that the references may be combined and a reasonable expectation of success exists, the combined references do not disclose or suggest all of the claim limitations.

Claim 47 recites, *inter alia*:

switching thin film transistors for transmitting *data signals*; and

driving thin film transistors for driving an organic electroluminescent device so that a certain amount of current flows through the organic electroluminescent device *according to the data signals* (emphasis added)

The combined references fail to disclose at least such features. The Office Action refers to Nakajima's Figure 14 and asserts that Nakajima's pixel TFT 504 teaches the switching TFTs of claim 47 and that Nakajima's TFTs in the driving circuit section teach the driving TFTs of claim 47 (See Office Action, pages 2-3). Applicants respectfully disagree. The driving TFTs of claim 47 "[drive] an organic electroluminescent device so that a certain amount of current flows through the organic electroluminescent device *according to the data signals*" (emphasis added). In other words, the switching TFTs transmit data signals, and the driving TFTs drive an organic electroluminescent device according to the data signals from the switching TFTs. On the other hand, Nakajima's driver circuit TFTs form a CMOS circuit, which is the basic circuit for control circuits such as a shift register circuit and a buffer circuit, and a sampling circuit (See col. 15, lines 37-44). Nakajima does not disclose that the driver circuit TFTs of Figure 14 drive an organic electroluminescent device according to the data signals from the pixel TFT 504 of the pixel portion. Hence, Nakajima does not disclose driving TFTs that "[drive] an organic electroluminescent device so that a certain amount of current flows through the organic electroluminescent device according to the data signals." Therefore, the combined references fail to teach or suggest each and every feature of claim 47.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claim 47. Since none of the other prior art of record discloses or suggests all the

features of the claimed invention, Applicants respectfully submit that independent claim 47 is allowable.

Allowable Subject Matter

Applicants appreciate the indication that claims 3, 4, 8, and 13 are allowed.

CONCLUSION

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

/hae-chan park/

Hae-Chan Park
Reg. No. 50,114

Date: March 16, 2007

H.C. Park & Associates, PLC
8500 Leesburg Pike
Suite 7500
Vienna, VA 22182
Tel: 703-288-5105
Fax: 703-288-5139
HCP/BYC/tmk